Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Amendment of the Commission's Rule Regarding Dedicated Short-Range Communication Services in the 5.850-5,925 GHz Band (5.9 GHz Band)	)	WT Docket No.: 01-90
Amendment of Part 2 and Part 90 of the Commission's Rules to Allocate the 5.850-5.925 GHz Band to the Mobile Service for Dedicated Short Range Communications of Intelligent Transportation Services	)	ET Docket No.: 98-95 RM-9096

TO: The Commission

REPLY COMMENTS BY THE ALLIANCE OF AUTOMOBILE MANUFACTURERS, INC.

The Alliance hereby submits the following reply comments in the above captioned matter.

Background

The Alliance of Automobile Manufacturers, Inc. (the "Alliance") is a trade association composed of the world's leading car and light truck manufacturers, with approximately 600,000 employees at more than 250 facilities in 35 states. Alliance members account for more than 90 percent of vehicle sales in the United States. The member companies comprising the Alliance include: BMW Group; DaimlerChrysler; Ford Motor Company; General Motors; Mazda; Mitsubishi Motors; Porsche; Toyota; and Volkswagen.

Channel 172

A key function of the Alliance is to facilitate and convey the commitment of its members to important public interest goals, including the goal of enhancing motor vehicle safety. In paragraphs 28-29 of the *Report & Order* (FCC-03-324 on February 10, 2004, published in Federal Register (69 FR 46438) on August 3, 2004), the FCC found that it was "premature" to reserve Channel 172 for automotive safety applications that require high availability and low latency. The Commission also noted its view that channel assignments are best addressed by priority levels of the Control Channel protocol.

Alliance members have affirmed their view that it is particularly important for one channel to be designated and reserved to provide an interference-free environment for intensive and critical interactions in certain emergency safety situations. Not all safety communications are equal. The Alliance has confidence that routine safety communications can co-exist with private application communications on all DSRC channels and work effectively in the mitigation of accidents and to help improve traffic flow, given the ongoing effort in designing and defining priority and other mechanisms for both the Control Channel and other channels. However, it is anticipated that some advanced safety application concepts (e.g., last-second impact mitigation maneuvers) could place additional, more stringent requirements on channel availability and communication qualities in such a way that is difficult and unlikely to be satisfied by the aforementioned priority levels of the Control Channel's protocols. Without designating and preserving Channel 172 for "high availability and low latency" communications, many next generation critical safety application concepts could be precluded because all

channels could become occupied by other services before these new safety applications are deployed.

Also, in order to integrate new electronic technology into a typical automotive design development life cycle, automobile manufacturers may normally take 5-6 years especially for a new electronic technology (e.g., DSRC) to be incorporated into a vehicle's electrical system across all its model lines. Deferring consideration of the designation of a specific vehicle safety channel will create uncertainty for automobile manufacturers and could potentially further delay or deter the incorporation of DSRC devices in new vehicles.

Therefore, we strongly support the comments filed by ITS America, and ARINC, Incorporated (both dated September 2, 2004), that a unique channel designation for automotive safety applications will best serve the public interest and will ensure that adequate capacity is available on a timely basis for the core safety applications that are a critical component of ITS.

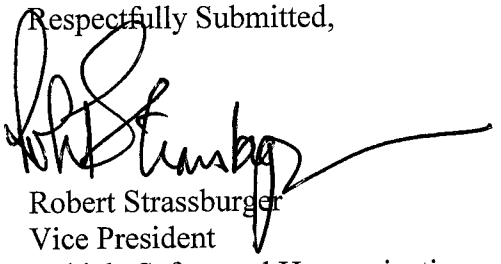
Accordingly, the Alliance strongly requests the Commission to reconsider and/or clarify its rules to designate Channel 172 for high-availability, low-latency safety communications.

Revisions to ASTM-DSRC Standard

As cited in the ARINC, Incorporated comments filed on September 2, 2004, the Alliance similarly requests that the Commission keep open this docket until after such time as the revised standard is submitted and the public is afforded an opportunity to review and comment on the revised ASTM DSRC Standard.

The Alliance will continue to review the reply comments in this proceeding and we appreciate the Commission's consideration of our comments regarding this matter.

Respectfully Submitted,



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September 30, 2004